

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Keith Jones, Individually and on Behalf of All Others Similarly Situated,	:	
	:	
and	:	
Nathan Andrews, Individually and on Behalf of All Others Similarly Situated,	:	Case No. 2:17-cv-1086 2:19-cv-2514
	:	
Plaintiffs,	:	Judge Edmund A. Sargus Jr.
	:	
v.	:	Magistrate Judge Kimberly A. Jolson
	:	
Producers Service Corporation,	:	
	:	
Defendant.	:	

**JOINT STATUS REPORT**

Plaintiffs and Defendant submit this Joint Status Report to update the Court on the status of settlement and the remaining issues in this case. On February 19, 2025, the parties executed a settlement agreement fully resolving Plaintiffs' claims for alleged unpaid wages and liquidated damages. Payment of the settlement will be made in installments commencing twenty-one days following the date this action is dismissed.

The Parties' settlement does not include any amounts for attorneys' fees, the amount of which the Parties dispute. Plaintiffs' counsel provided Defendant's counsel with itemized fee and cost records on March 11, 2025. As this information dates back to 2017, Defendant is still in the process of reviewing same. After review is completed, the Parties are amenable to and suggest that additional settlement negotiations take place prior to briefing the issue before this Court.

Therefore, to conserve resources and allow the Parties a meaningful opportunity to negotiate attorneys' fees, they propose submitting their dismissal motion either after reaching an agreement on fees or, if no agreement is reached, submitting a motion on liability once negotiations

reach an impasse, since submitting a liability motion before resolving or exhausting discussions on fees may unnecessarily constrain the Parties' ability to reach a resolution and result in premature motion practice.

Respectfully submitted,

/s/ Danielle M. Crane

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